

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE  
PLACEMENT CONSUMER PRIVACY  
LITIGATION

C.A. 12-MD-2358 (SLR)

This Document Relates to:  
**All Actions**

**[PROPOSED] ORDER RE:  
TIMING FOR BRIEFING ON POINTROLL'S MOTION TO DISMISS**

WHEREAS, this multidistrict litigation consists of 24 consolidated class actions assigned to this Court by the Judicial Panel on Multidistrict Litigation;

WHEREAS, Plaintiffs in the consolidated actions filed a 79-page consolidated amended complaint ("CAC") on December 19, 2012 on behalf of a putative nationwide class of plaintiffs against Defendant PointRoll, Inc. ("PointRoll") and four other Defendants;

WHEREAS, PointRoll responded to the CAC by filing a motion to dismiss the CAC (the "Motion") under Rule 12 of the Federal Rules of Civil Procedure on January 22, 2013;

WHEREAS, Civil Local Rule 7.1.2(b) imposes a deadline of 14 days from the date of service of a motion to dismiss for response, and a deadline of 7 days for reply;

WHEREAS, Plaintiffs and Defendant Google, Inc. ("Google") filed a stipulation and proposed order on January 8, 2013, and the Court so ordered on January 9, 2013, the modification of the time limits of D. Del. LR 7.1.2(b) as follows: Plaintiffs' response to Google's motion to dismiss shall be due on February 26, 2013, and Google's reply thereto shall be due on March 19, 2013;

WHEREAS, Plaintiffs and Defendants Media Innovation Group, LLC, WPP plc, and Vibrant Media Inc. filed a stipulation and proposed order on January 11, 2013, and the Court so ordered on January 15, 2013, the modification of the time limits of Fed. R. Civ. P. 12(a)(1)(A)(i) and D. Del. LR 7.1.2(b) as follows: these three Defendants' motions to dismiss shall be due on February 22, 2013; Plaintiffs' response to these three Defendants' motions to dismiss shall be due on March 29, 2013, and these three Defendants' replies thereto shall be due on April 19, 2013; and

WHEREAS, PointRoll has not requested an enlargement of page limits or modifications in the briefing schedule, but the Plaintiffs have requested and PointRoll does not oppose an enlargement of Plaintiff's time to respond to PointRoll's Motion to align it with the deadline for Plaintiff's response to Google's motion to dismiss of February 26, 2013, in order to coordinate and streamline the schedule in this case, and Plaintiffs have agreed to similarly extend PointRoll's time to reply to March 19, 2013;

THEREFORE, the undersigned parties, through their respective counsel of record, subject to approval by the Court, request that:

The time limits of Civil Local Rule 7.1.2(b) be modified as follows: Plaintiffs' response to PointRoll's motion to dismiss shall be due on February 26, 2013, and PointRoll's reply thereto shall be due on March 19, 2013.

Respectfully submitted,

Dated: January 23, 2013

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*Interim Lead Counsel for the Putative Plaintiff Class*

**SO ORDERED** on this \_\_\_\_\_ day of \_\_\_\_\_, 2013.

\_\_\_\_\_  
Hon. Sue L. Robinson  
United States District Judge